

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

MAHAN JANBAKHS
a/k/a MARK JANBAKHS
STEVEN PIPER

Case No. 3:22-cr-00340

CHIEF JUDGE CRENSHAW

Joint Discovery Report

On March 7, 2023, the Court ordered the parties, among other things, to “file a report on Defendants’ access to discovery, supplemental discovery from the government and Defendants’ review of discovery and any other matter that the parties need to bring to the Court’s attention.” In accordance with that order, the parties state the following:

1. To date, the government has made three discovery productions on or about the following dates: (a) December 5, 2022; (b) February 15, 2023; and (c) April 17, 2023.

2. After receiving the first two productions, defendants worked diligently to access and process the data. During that effort, defendants and the government conferred several times to address questions and technical issues. In late March 2023, it was determined that there were technical errors in the government’s first production that resulted in large portions of the discovery being corrupted (and therefore inaccessible) or inadvertently not produced at all. Thereafter, the

government requested, and the defendants provided, new hard drives to allow the government to re-produce these materials after addressing the technical issues.

3. On April 17, 2023, the government made the third production, which included (a) materials re-produced from the first production after the technical errors were fixed and (b) a significant production of new material that was inadvertently not produced in the first two rounds of production. The government also indicated that it expects a fourth production of material to be forthcoming in the next several weeks. The government estimates that production will include approximately 8 gigabytes of data.

4. Defendants have begun the process of accessing and processing the material from the third production. This is a time-consuming process because, among other reasons, the data includes several full images of computer media. As a result, and without delving into excessive technical detail, it requires an extensive e-discovery process before that data can even be accessed. Defendants continue with that process currently, but it is not complete due to the volume of material. No technical problems have been encountered to date with the third production.

5. The parties do not believe there are discovery-related or other issues that require the Court's intervention at this time.

Respectfully submitted,

s/ Ty E. Howard

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CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2023, a copy of the foregoing document was filed electronically with the Clerk's office by using the CM/ECF system and served electronically upon all counsel as follows:

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